



SEALED

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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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6 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

7 UNITED STATES OF AMERICA,

8 Plaintiff,

9 vs.

10 MATEO VAILON-RAMIREZ,

11 JASMIN ARREDONDO,

12 MARIA BALTAZAR,

13 MIGUEL FELIX-VALDEZ,

14 REY MUNOZ-AMBROCIO,
aka "Mario Avila-Cruz,"

15 FRANCISCO TOSTADO, and

16 CHRISTINA VASQUEZ,

17 Defendants.

SEALED
CRIMINAL INDICTMENT

Case No.: 2:21-cr- *58*

VIOLATIONS:

21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii), and 846
– Conspiracy to Distribute a Controlled
Substance (Methamphetamine)

21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii) –
Distribution of a Controlled Substance
(Methamphetamine)

21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii) –
Possession with Intent to Distribute a Controlled
Substance (Methamphetamine)

18 U.S.C. § 2 – Aiding and Abetting

16 **THE GRAND JURY CHARGES THAT:**

17 **COUNT ONE**

(Conspiracy to Distribute a Controlled Substance – Methamphetamine)

18 Beginning from a date unknown and continuing up to and including on or about
19 January 26, 2021, in the State and Federal District of Nevada, and elsewhere,

1 **MATEO VAILON-RAMIREZ,**
2 **JASMIN ARREDONDO,**
3 **MARIA BALTAZAR,**
4 **MIGUEL FELIX-VALDEZ,**
5 **REY MUNOZ-AMBROCIO,**
6 **aka "Mario Avila-Cruz,"**
7 **FRANCISCO TOSTADO, and**
8 **CHRISTINA VASQUEZ,**

9 the defendants herein, did knowingly and intentionally combined, conspired, confederated and
10 agreed with each other, and with other persons known and unknown to the grand jury, to
11 distribute 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in
12 violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii) and 846.

13 **COUNT TWO**

14 (Distribution of a Controlled Substance—Methamphetamine)

15 On or about May 27, 2020, in the State and Federal District of Nevada,

16 **MARIA BALTAZAR,**

17 the defendant herein, did knowingly and intentionally distribute 50 grams or more of actual
18 methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States
19 Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

20 **COUNT THREE**

21 (Distribution of a Controlled Substance—Methamphetamine)

22 On or about June 24, 2020, in the State and Federal District of Nevada,

23 **MATEO VAILON-RAMIREZ, and**
24 **MIGUEL FELIX-VALDEZ,**

25 the defendants herein, aiding and abetting one another, did knowingly and intentionally
26 distribute 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in
27 violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii) and Title 18,
28 United States Code, Section 2.

COUNT FOUR

(Distribution of a Controlled Substance—Methamphetamine)

On or about July 7, 2020, in the State and Federal District of Nevada,

**MATEO VAILON-RAMIREZ, and
REY MUNOZ-AMBROCIO,
aka "Mario Avila-Cruz,"**

the defendants herein, aiding and abetting one another, did knowingly and intentionally distribute 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii) and Title 18, United States Code, Section 2.

COUNT FIVE

(Possession with Intent to Distribute a Controlled Substance—Methamphetamine)

On or about November 19, 2020, in the State and Federal District of Nevada,

**MATEO VAILON-RAMIREZ,
MIGUEL FELIX-VALDEZ, and
CHRISTINA VASQUEZ,**

defendants herein, aiding and abetting one another, did knowingly and intentionally possess with

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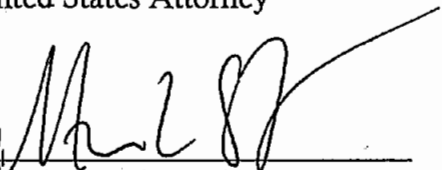
1 the intent to distribute 50 grams or more of actual methamphetamine, a Schedule II controlled
2 substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii)
3 and Title 18, United States Code, Section 2.

4 **DATED:** this 16th day of February, 2021.

5 **A TRUE BILL:**

6 /S/
7 FOREPERSON OF THE GRAND JURY

8 NICHOLAS TRUTANICH
United States Attorney

9 By 
10 MELANEE SMITH
Assistant United States Attorney

11 Attorneys for Plaintiff
12 UNITED STATES OF AMERICA